

National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



March 20, 2012

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Space Policy Institute Dinner on March 22, 2012

On March 22, 2012, the Space Policy Institute of George Washington University's (GWU) Elliott School of International Affairs, a not-for-profit organization under Section 501(c)(3) of the Internal Revenue Service Code, will hold a technical symposium with a coffee break and USRA-sponsored reception. This event will take place at the Marriott Residence Inn, 333 E Street, S.W., Washington, D.C., from 5 PM to 8 PM. The purpose of the event is to provide a forum for discussion of the opportunities for university space research using small satellites, suborbital launch vehicles and balloons.

Approximately 160 people are expected to attend the event. Attendees will include NASA personnel and other federal agencies, congressional staff, and representatives from academia and industry. The estimated cost of the event, including all food and beverages, is around \$90 per person.

I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information on NASA's programs and policies. Accordingly, NASA employees whose duties do not substantially affect the sponsor, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and an invited guest for free attendance to the event.

However, NASA employees whose duties may substantially affect the event sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone", written over a light blue horizontal line.

Adam F. Greenstone